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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,) CASE NO. 3:17-CR-180 RS
16 Plaintiff,)
17 v.) STIPULATION AND
18 APRIL MYRES, and) [PROPOSED] ORDER EXCLUDING TIME
19 ANTOINE FOWLER,) UNDER THE SPEEDY TRIAL ACT
20 Defendants.)
21 _____)

22 The parties appeared before the Court for a status conference on May 1, 2018. The parties, with
23 the consent of the defendants, hereby stipulate as follows:

24 1. The United States has provided the defendants with discovery materials, and the
25 defendants require additional time to review the discovery and to prepare effectively.

26 2. There is good cause to exclude time under the Speedy Trial Act as the ends of justice
27 from such an exclusion outweigh the best interest of the public and the defendants in a
speedy trial. Specifically, such an exclusion provides the respective defense counsel
reasonable time for effective preparation, taking into account due diligence. 18 U.S.C.
§ 3161(h)(7)(A) and (h)(7)(B)(iv).

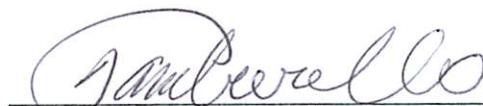
1 3. Based on the foregoing, the parties jointly and respectfully request that the Court issue
2 the proposed order excluding time under the Speedy Trial Act.

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4 IT IS SO STIPULATED.

5 DATED: May 1, 2018

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7 DATED: May 1, 2018

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9
10 DATED: May 1, 2018


TONY TAMBURELLO
Counsel for Defendant Myres


KENNETH HOWARD WINE
Counsel for Defendant Fowler


ALEX G. TSE
Acting United States Attorney

JEFFREY SHIH
Assistant United States Attorney

20 **[PROPOSED] ORDER TO EXCLUDE TIME**

21 Based on the stipulation of the parties, the consent of the defendants, and on good cause shown,
22 the Court orders that the time period from the date of this Order, through and including the date set for
23 the hearing before the District Court on June 26, 2018, is excluded under the Speedy Trial
24 Act. The Court bases this exclusion of time and makes the findings as stipulated by the parties above.

25 IT IS SO ORDERED.

26 Dated: 5-1-, 2018


HON. RICHARD SEEBORG
United States District Judge